



impose a constructive trust, obtain possession, and/or recover judgment with respect to persons or entities who received assets or records traceable to the Receivership Estate.” Receivership Order at ¶5(c). Pursuant to the Receivership Order, “[a]ll such actions shall be filed in this [Judge Atlas’s] Court.” *Id.* Additionally, Judge Atlas retained jurisdiction over disputes arising out of a Compromise Settlement and Release Agreement between Receiver and Defendants. *See* Settlement Approval Order at p. 4 ¶6 (“The Court shall have and retain jurisdiction over all matters related to the administration, interpretation, effectuation, or enforcement of this Order, the Compromise Settlement and Release Agreement between the Wallace Bajjali Parties and the Receiver, and any related disputes”).

The present action is a suit to recover judgment with respect to assets traceable to the Receivership Estate. The present action is a suit related to the enforcement of promissory notes and guaranty agreements executed pursuant to the Compromise Settlement and Release Agreement between the Wallace Bajjali Parties and the Receiver (*see* Enforcement Action Dkt. 113-1). Accordingly, the Receivership Order and Settlement Approval Order require that the present action be transferred to Judge Atlas’s Court.

### **CONCLUSION AND PRAYER**

The Receiver respectfully requests the transfer of the above-styled action to Judge Atlas’s Court pursuant to the Receivership Order and Settlement Approval Order, and all other relief to which he may be legally or equitably entitled.

Dated: February 5, 2015

Respectfully submitted,

THE TAYLOR LAW OFFICES, P.C.

By: /s/ Andrew M. Goforth

Andrew M. Goforth

Andrew M. Goforth

Texas State Bar: 24076405

*goforth@tltaylorlaw.com*

4550 Post Oak Place Drive, Suite 241

Houston, Texas 77027

Tel: (713) 626-5300

Fax: (713) 402-6154

COUNSEL FOR RECEIVER

**CERTIFICATE OF SERVICE**

On February 5, 2015, I served the foregoing document on all parties as listed below by U.S. Mail, Return Receipt Requested, pursuant to Federal Rule of Civil Procedure 5(b)(2)(C).

***Via U.S. Mail, Return Receipt Requested:***

David G. Wallace

1634 Brookstone Ln.

Sugar Land, TX 77479

Costa Bajjali

2911 Waters Lake Ln.

Missouri City, TX 77459

Laffer Frishberg Wallace Economic Opportunity Fund, L.P. d/b/a LFW Economic Opportunity Fund

c/o David G. Wallace, registered agent

1634 Brookstone Ln.

Sugar Land, TX 77479

West Houston WB Realty Fund, L.P.

c/o David G. Wallace, registered agent

1634 Brookstone Ln.

Sugar Land, TX 77479

/s/ Andrew M. Goforth

Andrew M. Goforth